

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NSI INTERNATIONAL, INC.,

Plaintiff,

v.

JINHUA FIDGET TOYS CO., LTD., et al.,

Defendants.

Case No. 24-cv-11073

Judge Lindsay C. Jenkins

Magistrate Judge Beth W. Jantz

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT
AND AN AWARD OF STATUTORY DAMAGES**

Plaintiff NSI International, Inc. (“Plaintiff”) moves this Honorable Court to enter summary judgment in favor of Plaintiff and against Defendants HONGBING Co.Ltd (Def. No. 33), HUAZAN Co.Ltd (Def No. 35), SIJI Co.Ltd (Def. No. 43), and YISHAO Co.Ltd (Def. No. 50) (“Defendants”). Further, Plaintiff requests an award of statutory damages in the amount of \$75,000 and an award of attorney’s fees against each of the Defendants. In support of this Motion, Plaintiff submits the accompanying Memorandum.

Dated this 28th day of April 2025.

Respectfully submitted,

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Counsel for Plaintiff NSI International, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of April 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send a “Notice of E-Filing” to the attorneys of record in this case.

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